

Ceola McDonald, Esq. (SBN:219601)  
THE LAW OFFICE OF CEOLA McDONALD  
19506 Highway 59 North, Suite 305  
Humble, Texas 77338  
Phone: (281) 674-4876  
Fax: (310) 601-1853

Attorney for Kevin Wilson

**IN THE UNITED STATES DISTRICT COURT FOR  
SOUTHERN DISTRICT OF CALIFORNIA**

KEVIN WILSON

Plaintiff,

vs.

J.P. ALLEN COMPANY DBA  
HOLIDAY INN BURBANK-MEDIA  
CENTER a California Corporation; and  
DOES 1 through 10, inclusive.

DEFENDANTS

CIVIL ACTION NO.: '13CV1431 BEN BLM

SECTION: \_\_\_\_\_

**JURY TRIAL DEMANDED**

**COMPLIANT**

Plaintiff, Kevin Wilson, a person of the full age of majority and resident of the State of  
Louisiana, represents that:

I.

Made defendants herein are:

a) J.P. Allen Company dba Holiday Inn Burbank-Media Center, under information  
and belief, a business entity incorporated in the State of California and doing business as the  
Holiday Inn Burbank-Media Center; and,



VI.

Plaintiff itemizes his damages, which have included foot surgery and the inability to work from the date of the accident forward, as follows:

- a) Pain and suffering, both physical and mental/emotional: past, present and future;
- b) Bodily disability: past, present and future;
- c) Loss of use/function of parts of body: past, present and future;
- d) Impairment of psychological functioning: past, present and future;
- e) Loss of enjoyment of life: past, present and future;
- f) Medical expenses: past, present and future;
- g) Lost wages: past, present and future;
- h) Disability from working to earn an income: past, present and future;
- i) Destruction of earning capacity: past, present and future; and,
- j) Disability from engaging in recreation: past, present and future;

Plaintiff maintains that he is entitled to all such damages as are reasonable in the premises, in accordance with California law.

VII.

At all times pertinent hereto, J.P. Allen Company owned and managed the Holiday Inn Burbank-Media Center where the accident occurred.

VIII.

J.P. Allen Company is liable for the actions of its employees under the doctrine of respondeat superior and vicarious liability.

IX.

At all times pertinent hereto, defendant, XYZ Insurance Company, provided a policy of insurance covering the J.P. Allen Company, and, as such, XYZ Insurance Company is liable for the damages suffered by the plaintiff.

X.

Plaintiff desires and is entitled to a trial by jury.

WHEREFORE, plaintiff prays that:

1 a) After due proceedings be had, there be Judgment in the plaintiff's favor and  
2 against defendants as are reasonable in the premises in accordance with the provisions of the  
3 law;

4 b) Plaintiff be granted a trial by jury; and,

5 c) Plaintiff be granted all other legal and general relief as the nature of this case may  
6 permit.

7 Respectfully submitted,

8  
9 DATED: June 19, 2013

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11 */Ceola McDonald*

12 CEOLA McDONALD  
13 Attorney for PLAINTIFF  
19506 Highway 59 North, #305  
Humble, TX 77338  
Phone: (281)674-4876  
Fax: (310)601-1853

14 PLEASE SERVE:

15 J P Allen Company  
16 924 W. Glenoaks Blvd.  
Glendale, CA 91202-2752  
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